

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JOHN ANTHONY CASTRO (01)

CRIMINAL NO. 4:24-CR-001-Y

AGREED STIPULATIONS OF EVIDENCE

The United States Attorney for the Northern District of Texas (the government) and the defendant, John Anthony Castro, agree to stipulate to the following issues for trial.

Stipulation No. 1

If called, the following witnesses would testify as set forth in the following identified paragraphs of the Government's Proposed Findings of Fact and Conclusions of Law (Dkt. No. 34):

- (1) Paul and Alissa Clayton – paragraphs 174-191. The Claytons would also sponsor Government Exhibits 108-113, and the parties have no objection to the admission of these exhibits.
- (2) James Boggs and Frances Ffis-Boggs – paragraphs 193-230. Mr. Boggs and Mrs. Ffis-Boggs would also sponsor Government Exhibits 114-130, and the parties have no objection to the admission of these exhibits.
- (3) Linda Rivera – paragraphs 232-256. Mrs. Rivera would also sponsor Government Exhibits 131-143, and the parties have no objection to the admission of these exhibits.
- (4) Christian and Ciara Karavangelos – paragraphs 258-294. The Karavangelos's would also sponsor Government Exhibits 144-170, and the parties have no objection to the admission of these exhibits.

- (5) Javier and Betsy Sola – paragraphs 324-359. The Solas would also sponsor Government Exhibits 204-223, and the parties have no objection to the admission of these exhibits.
- (6) Joseph and Kayla Zilinski – paragraphs 360-392. The Zilinskis would also sponsor Government Exhibits 224-245, and the parties have no objection to the admission of these exhibits.
- (7) Crystal Wells – paragraphs 414-440. Ms. Wells would also sponsor Government Exhibits 256-264, and the parties have no objection to the admission of these exhibits.
- (8) Brian and Kimberly Quigley – paragraphs 441-458. The Quigleys would also sponsor Government Exhibits 265-281, and the parties have no objection to the admission of these exhibits.
- (9) Fabio Ramos – paragraphs 544-569. Mr. Ramos would also sponsor Government Exhibits 354-386, and the parties have no objection to the admission of these exhibits.
- (10) Federico and Justine Turatti – paragraphs 570-606. The Turattis would also sponsor Government Exhibits 387-407, and the parties have no objection to the admission of these exhibits.

As a result, the parties will not call the individuals identified above as witnesses in the trial set for May 20, 2024, and will instead rely on the stipulations referenced above and below, in addition to other admissible evidence as to the counts involving these individuals.

Stipulation No. 2

Government Exhibits 1-16, 21-27, 31-41, 46-55, 81-407 (omitting those that are reserved), 434-466, and 467-480 are authentic records and the parties do not challenge the admission of any these records under Federal Rule of Evidence 901(A).

Stipulation No. 3

The parties stipulate that the facts identified in the document attached as Exhibit A to this filing are true and accurate facts relevant to this case and should be accepted by the Court as evidence in the case.

LEIGHA SIMONTON
UNITED STATES ATTORNEY

/s/ P.J. Meitl

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Counsel for the Defendant, John Castro

CERTIFICATE OF SERVICE

On May 13, 2024, I electronically submitted the following document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Criminal Procedure 49(b).

/s/ P.J. Meitl

P.J. Meitl
Assistant United States Attorney